

**U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

ZHIJUN XIA,

Defendant.

Case No. 4:20 CR 3062

**AMENDED MOTION FOR  
DEPARTURE AND/OR VARIANCE  
AND DEFENDANT'S WRITTEN  
STATEMENT OF HIS POSITION  
RESPECTING EACH OF THE  
UNRESOLVED OBJECTIONS TO THE  
PRESENTENCE REPORT**

COMES NOW the Defendant, by and through his attorney Steve Lefler, and, even though the undersigned does not think it is necessary given the pending plea agreement with the government, moves the Court for a departure and/or variance from the guidelines, which position will be set forth more fully in his brief.

The Defendant specifically objects to and will address paragraphs 27, 36, 37, and 47; paragraph 38; paragraph 41, 43, 48 and 63; paragraphs 75-77; 80, and 95-97, again which will be developed in the accompanying brief.

ZHIJUN XIA, Defendant

By: /s/ Steve Lefler  
Steve Lefler #15434  
Matthew Burns, #25437  
1213 JONES St.  
Omaha, Nebraska 68102  
(402) 342 4433  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing was forwarded to the parties by way of First Class Mail, E-mail and/or Electronic Service on JULY 1, 2021.

/s/ Steve Lefler

Steve Lefler